

BLANK ROME LLP
Attorneys for Defendants
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
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(212) 885-5000

UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK

EXMAR SHIPPING N.V.,

Plaintiff,

v.

POLAR SHIPPING S.A., et al.,

Defendants.

06 CIV 12991(HB)

**EMERGENCY MOTION UNDER RULE E(4)(f) OF
THE SUPPLEMENTAL RULES FOR CERTAIN
ADMIRALTY AND ASSET FORFEITURE
CLAIMS AND LOCAL ADMIRALTY RULE E.1
FOR AN EXPEDITED HEARING, ORDER
DIRECTING SUBSTITUTE SECURITY AND
OTHER RELIEF**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the Affidavit of Jeremy J.O. Harwood dated January 30, 2007, and all the exhibits thereto, defendants, will move this Court before the Hon. Baer, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York on February 1, 2007 at 2:30 p.m., for an Order pursuant to Rule E(4)(f) of the Supplemental Rules for Certain

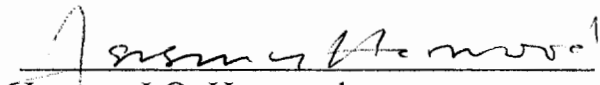
Admiralty and Marine Claims of the Federal Rules of Civil Procedure reducing the amount of security that Plaintiff has attached in exchange for substitute security and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York
January 30, 2007

Respectfully submitted,

BLANK ROME LLP

By: 
Jeremy J.O. Harwood
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New York, New York 10174
(212) 885-5000

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Jeremy J.O. Harwood (JH-9012)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EXMAR SHIPPING N.V.,

Plaintiff,

V.

POLAR SHIPPING S.A., et al.,

Defendants.

06 CIV 12991(HB)

AFFIDAVIT OF SERVICE BY FEDEX

[illegible]

The undersigned being duly sworn, deposes and says:

That deponent is not a party to the action, is over 18 years of age. That on January 31, 2007, she caused to be served a true copy of the following documents:

MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS' APPLICATION FOR AN EXPEDITED HEARING ON AND IN SUPPORT OF ITS REQUEST TO REDUCE PLAINTIFF'S MARITIME ATTACHMENT IN EXCHANGE FOR SUBSTITUTE SECURITY AND OTHER RELIEF

EMERGENCY MOTION UNDER RULE E(4)(f) OF THE
SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND ASSET
FORFEITURE CLAIMS AND LOCAL ADMIRALTY RULE E.1 FOR
AN EXPEDITED HEARING, ORDER DIRECTING SUBSTITUTE
SECURITY AND OTHER RELIEF

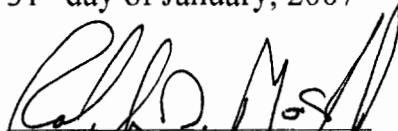
AFFIDAVIT IN SUPPORT OF MOTION UNDER RULE E(4)(f) OF THE
SUPPLEMENTAL RULES FOR CREATION CERTAIN ADMIRALTY
AND MARINE CLAIMS AND LOCAL ADMIRALTY RULE E.1 FOR
AN EXPEDITED HEARING AND VACATUR OR REDUCTION OF
PLAINTIFF'S MARITIME ATTACHMENT

by FedEx courier upon:

James L. Ross, Esq.
Freehill Hogan & Mahar LLP
New York, NY 10005


RENEE KINTZER

Sworn to before me this
31st day of January, 2007


Notary Public

RALPH D. MOSLEY JR.
Notary Public, State of New York
No. 52-4798627
Qualified in Suffolk County
Certificate Filed in New York County
Commission Expires 6/30/07